

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA :</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:     DATE FILED: _____</b>
<b>ALESSANDRO TRAMO,</b>	<b>:     VIOLATIONS:</b>
<b>a/k/a “Alex,”</b>	<b>18 U.S.C. § 371 (conspiracy to commit</b>
<b>BRUCE ARMSTRONG</b>	<b>arson - 1 count)</b>
<b>WILLIAM ANDERSON</b>	<b>18 U.S.C. § 844(i) (arson - 1 count)</b>
	<b>18 U.S.C. § 2 (aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to the indictment:

1. Ben’s Deli and Cafeteria (“Ben’s Deli”), located at 103 East Bridge Street, Morrisville, Bucks County, Pennsylvania, was a restaurant and business engaged in interstate commerce.
2. Defendant ALESSANDRO TRAMO was the owner of Anthony 4 Pizzeria, located at 44 Bridge Street, Morrisville, in close proximity to Ben’s Deli.
3. Between in or about the summer of 2000 and in or about mid-December 2000, in Morrisville, Bucks County, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ALESSANDRO TRAMO,**  
**a/k/a “Alex,”**  
**BRUCE ARMSTRONG,**  
**and**  
**WILLIAM ANDERSON**

conspired and agreed together and with another person known to the grand jury to commit arson, that is, to damage and destroy, by means of fire, Ben's Deli and Cafeteria, located at 103 East Bridge Street, Morrisville, Bucks County, Pennsylvania, in violation of Title 18, United States Code, Section 844(i).

**MANNER AND MEANS**

4. It was part of the conspiracy that defendants ALESSANDRO TRAMO, WILLIAM ANDERSON, BRUCE ARMSTRONG, and another person known to the grand jury, agreed to burn down Ben's Deli to eliminate competition to defendant TRAMO's pizzeria.

It was a further part of the conspiracy that:

5. Defendant ALESSANDRO TRAMO solicited defendant WILLIAM ANDERSON to burn down Ben's Deli for \$10,000.

6. Defendant WILLIAM ANDERSON, in turn, solicited defendant BRUCE ARMSTRONG and another person known to the grand jury to burn down Ben's Deli.

7. Defendant WILLIAM ANDERSON provided Molotov cocktails to defendant BRUCE ARMSTRONG and the other person to set the fire.

8. Defendant BRUCE ARMSTRONG and the other person set fire to Ben's Deli with the Molotov cocktails.

9. Defendant ALESSANDRO TRAMO paid money to defendant WILLIAM ANDERSON for arranging the fire at Ben's Deli and to pay defendant BRUCE ARMSTRONG and the other person for setting the fire.

### **OVERT ACTS**

In furtherance of the conspiracy, defendants and a person known to the grand jury committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. In or about the summer of 2000, defendant ALESSANDRO TRAMO met with defendant WILLIAM ANDERSON and offered to pay \$10,000 to have Ben's Deli burned down.
2. In or about September 2000, defendant WILLIAM ANDERSON met with defendant BRUCE ARMSTRONG and a person known to the grand jury. ARMSTRONG and the other person agreed with defendant ANDERSON to burn down Ben's Deli for money.
3. On or about December 1, 2000, defendant WILLIAM ANDERSON supplied two Molotov cocktails to defendant BRUCE ARMSTRONG and the other person.
4. On or about December 2, 2000, defendant BRUCE ARMSTRONG and the other person set fire to Ben's Deli by throwing the Molotov cocktails into the business through the window.
5. On or about December 2, 2000, defendant ALESSANDRO TRAMO paid \$2,000 to defendant WILLIAM ANDERSON for disbursement to defendant BRUCE ARMSTRONG and the other person.
6. On or about December 2, 2000, defendant WILLIAM ANDERSON paid \$2,000 to defendant BRUCE ARMSTRONG and the other person.
7. In or about mid-December 2000, defendant ALESSANDRO TRAMO paid \$1,000 to defendant WILLIAM ANDERSON for arranging the fire at Ben's Deli.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 2 and 4 through 9 of Count One are realleged.
2. On or about December 2, 2000, in Morrisville, Bucks County, in the

Eastern District of Pennsylvania, defendants

**ALESSANDRO TRAMO,  
a/k/a “Alex,”  
BRUCE ARMSTRONG,  
and  
WILLIAM ANDERSON**

maliciously damaged and destroyed, attempted to damage and destroy, and aided, abetted, and procured the malicious damage and attempted destruction of, by means of fire, a building and equipment contained therein, used in interstate commerce and in activities affecting interstate commerce, that is, Ben’s Deli and Cafeteria, located at 103 East Bridge Street, Morrisville, Bucks County, Pennsylvania.

In violation of Title 18, United States Code, Section 844(i) and Section 2.

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**PATRICK L. MEEHAN**  
**United States Attorney**